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Section II: REMARKS

It is respectfully requested that the changes as noted above in Section I be made to the present application. It is noted that applicant herein refers to the application numbers of the cited references rather than the Publication Numbers of the cited references in order to be consistent with the Examiner's use of the application numbers rather than the Publication Numbers of the cited references in the referenced Office Action.

In the above referenced Office Action, which was mailed on 9/23/2005, the specification was objected to as not providing antecedent basis for claims 25 and 26. As herein amended, claims 25 and 26 have been cancelled without prejudice in order to further hasten the prosecution of the present application.

Next, claims 20 and 21 were rejected under 35 USC 102(a) as being anticipated by Yu (Application Number 10/646,151, hereinafter referred to as "Yu"), claims 1-4, 6-13, 15-19 and 22 were rejected under 35 USC 103(a) as being unpatentable over Mauro II (Application Number 10/319,239, hereinafter referred to as "Mauro"), in view of Aoki et al (Application Number 10/105,940, hereinafter referred to as "Aoki"), claims 5 and 14 were rejected under 35 USC 103(a) as being unpatentable over Mauro in view of Aoki in further view of Higuchi (U.S. Patent 6,823,182, hereinafter referred to as "Higuchi"), and claims 23 and 24 were rejected under 35 USC 103(a) as being unpatentable over Mauro in view of Aoki and still further view of Tomimori (U.S. Patent 6,456,841, hereinafter referred to as "Tomimori"). The above noted rejections are respectfully traversed. However, in order to further the prosecution of the present application, and without waiving any of applicant's rights to argue the allowability of the originally presented claims in a subsequent appeal or other

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proceeding in the event that the Examiner does not concur that the present amendment places the application in condition for allowance, applicant has herein amended the claims to place them in condition for allowance.

It is noted that the present application includes independent claims 1, 10, 19, 20 and 22, with the remaining dependent claims being ultimately dependent from and including all of the limitations of one of the independent claims. As herein amended, independent claim 20 has been cancelled without prejudice in order to further hasten the prosecution of the present application. All of the remaining independent claims have herein been amended as discussed below to include clarifications of features not disclosed or suggested in any of the references. The added clarifications and features of the independent claims are included in the dependent claims by dependence and therefore all of the remaining pending claims, both independent and dependent, have herein been amended to distinguish the present invention from the cited references.

Independent claims 1, 10, 19, 20 and 22 have herein been amended to clarify that, in accordance with the present invention, after a telecommunication connection operable to transmit voice communications has been established between a first device and a second device (e.g. when a telephone call is answered), that connection is detected by the second device and instructions are sent from the second device to the first device. The instructions indicate to the user of the first device which keypad inputs should be selected by the user of the first device in responding to subsequent communications from the user of the second device. This may be accomplished, *inter alia*, for example, by sending a menu to be displayed on the display screen of the first device or by sending a pre-recorded message from the second device to the

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first device. When the designated keypad inputs are entered by the user of the first device over the telecommunication connection to the second device, the second device responds by commencing different predetermined vibration patterns of the second device such that a hearing-impaired user of the second device is able to understand communications from the user of the first device by feeling the vibration patterns occurring at the second device in response, for example, to questions posed by the hearing-impaired user of the second device. None of the cited references, taken alone or in any combination, discloses or suggests the combinations recited in the claims as herein amended.

As herein amended, claims 20 and 21 have been cancelled without prejudice thereby obviating the rejection of claims 20 and 21 under 35 USC 102(a) as being anticipated by Yu.

Next, with regard to the rejection of claims 1-4, 6-13, 15-19 and 22 under 35 USC 103(a) as being unpatentable over Mauro in view of Aoki, it is noted that Mauro discloses the sending of data over a voice channel in order to change a mode of operation of a receiving apparatus. There is no mention anywhere in Mauro of using vibratory responses to received keypad inputs as is disclosed and claimed by applicant. Further, there is no reason even suggested by Mauro for using vibratory responses. Still further, there is no disclosure or even suggestion in Mauro of detecting by a second device of an establishment of a voice-enabled connection to a first device, or the sending of keypad instructions upon such detection from the second device to the first device, or the resulting vibratory responses at the second device to the subsequent keypad inputs at the first device. Aoki discloses a text message device not capable of voice-enabled connection. Like Mauro, there is no disclosure or even suggestion

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in Aoki of detecting by a second device of an establishment of a **voice-enabled** connection to a first device, or the **sending of keypad instructions** upon such detection from the second device to the first device, or the resulting vibratory responses at the second device to the keypad inputs at the first device. Further, there is no suggestion in either Mauro or Aoki for the hypothetical combination of the references and such a combination would render each of the references inoperable for its intended purpose. Lacking the above-noted claimed features of the present invention, it cannot be said that even the hypothetical combination of Mauro and Aoki renders the present invention obvious and it is believed that claims 1-4, 6-13, 15-19 and 22, as herein amended are allowable under 35 USC 103(a) over Mauro even in view of Aoki.

Next, with regard to the rejection of claims 5 and 14 under 35 USC 103(a) as being unpatentable over Mauro in view of Aoki, and in still further view of Higuchi, it is noted that Higuchi discloses only a cellular mobile telephone apparatus which includes circuits for generating, storing and transmitting stored messages to a calling party. There is no suggestion in Mauro, Aoki or Higuchi that the hypothetical combination of references is possible, beneficial or even useful for any stated purpose. Still further, like Mauro and Aoki, there is no disclosure or even suggestion in Higuchi of detecting by a second device of an establishment of a **voice-enabled** connection to a first device, or the **sending of keypad instructions** upon such detection from the second device to the first device, or the resulting vibratory responses at the second device to the keypad inputs at the first device. Since the Higuchi reference lacks the above-noted claimed features of the present invention, it cannot be said that even the hypothetical combination of Mauro, Aoki and Higuchi renders the present invention obvious and it is believed that claims 5

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and 14 are allowable under 35 USC 103(a) over Mauro in view of Aoki, and in still further view of Higuchi.

Next, with regard to the rejection of claims 23 and 24 under 35 USC 103(a) as being unpatentable over Mauro in view of Aoki and still further view of Tomimori, it is noted that Tomimori is cited merely to show the use of a voicemail system and that even a combination of Mauro, Aoki and Tomimori fails to disclose or even suggest detecting by a second device of an establishment of a **voice-enabled** connection to a first device, or the **sending of keypad instructions** upon such detection from the second device to the first device, or the resulting vibratory responses at the second device to the keypad inputs at the first device. Lacking the noted claimed features of the present invention, it cannot be said that even the hypothetical combination of Mauro, Aoki and Tomimori renders the present invention obvious and it is believed that claims 23 and 24 are allowable under 35 USC 103(a) over Mauro in view of Aoki, and in still further view of Tomimori.

It should be noted that applicant is claiming only that the **total combination of elements and relationships** as recited in the claims as herein amended, is neither anticipated nor rendered obvious by the cited references. Applicant is aware the individual bits and pieces of any claim can be isolated, and, when standing alone, those bits and pieces can be found in existing references. The similarity of various bits and pieces of the references as noted on pages 2-18 of the above-identified Office Action have been noted but it is believed, for the reasons stated above, that there is **no suggestion or nexus among the references to even suggest any combination of those references or the total combination of elements and relationships as recited in the claims as herein amended**. Where there is no teaching or suggestion in any of the references for the **specific total**

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combination of elements **and relationships** among those elements, as claimed by an applicant, it is submitted to be inappropriate to search the prior art using applicant's own disclosure as a recipe, to find piecemeal elements in prior art references for individual claimed elements, and then to combine those references in a manner disclosed not by any of the references but rather as disclosed only by the applicant, in order to reject applicant's own claims.

Thus, it is submitted that claims 1-19 and 22-24, as herein presented, are believed to be in condition for allowance, an early notice of which is hereby requested. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting the allowance of this application, and especially if one or more new references are cited, the Examiner is invited to contact the undersigned at the telephone number indicated below, prior to the issuance of another Office Action, in order to allow the applicant the opportunity to review any newly cited art and to further amend the claims by Supplemental Amendment or Examiner's Amendment, as may be appropriate, to place the claims in condition for allowance. The Examiner's attention to this matter is greatly appreciated.

Respectfully submitted,

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